

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

KALERA, INC.,¹

Debtor.

CHAPTER 11

CASE NO.: 23-90290 (DRJ)

**FIRST MONTHLY FEE STATEMENT OF BAKER & HOSTETLER LLP
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
INCURRED FROM APRIL 3, 2023 THROUGH APRIL 30, 2023**

This notice implements the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (Doc. No. 188). Each party receiving the notice of the monthly fee statement will have 14 days after the filing and service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtors are authorized and directed to pay the Professional an amount equal to 80 percent of the fees and 100 percent of the expenses requested in the applicable monthly fee statement that are not subject to an objection.

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (Doc. No. 188) entered by the Court on June 7, 2023 (the “**Interim Compensation Order**”), Baker & Hostetler LLP (“**B&H**”), as counsel to Kalera, Inc. (the “**Debtor**”), submits its first monthly fee statement (“**Fee Statement**”) for services rendered and expenses incurred in this chapter 11 case for the period of April 3, 2023 through April 30, 2023 (the “**Statement Period**”).

On June 7, 2023, the Court entered an order approving the Debtor’s retention of B&H as counsel to the Debtors (Doc. No. 187), effective as of the Petition Date.

¹ The last four digits of the Debtor’s federal tax identification number is 7838. The Debtor’s mailing address is Kalera, Inc., Gateway Business Center 23, 18000 East 40th Avenue, Aurora, CO 80011.

B&H seeks payment of interim compensation in the total amount of \$245,466.06 which is calculated as follows: \$245,258.40 in fees (80% of \$306,573.00) and \$207.66 in expenses (100% of interim expenses). Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, by 14 days after the filing and service of the Fee Statement, serve a written objection setting forth the precise nature of the objection and the amount at issue upon B&H and each of the following Fee Notice Parties as defined in the Interim Compensation Order:

- The Debtor: Kalera, Inc., Gateway Business Center 23, 18000 East 40th Avenue, Aurora, CO 80011 (Attn: Mark Shapiro, mshapiro@brileyfin.com);
- Counsel to the Debtor: Baker & Hostetler LLP, 200 S. Orange Avenue, Suite 2300, Orlando, FL 32801 (Attn: Elizabeth A. Green, egreen@bakerlaw.com; Jimmy D. Parrish, jparrish@bakerlaw.com; Jorian Rose, jrose@bakerlaw.com);
- The Office of the United States Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002 (Attn.: Andrew Jimenez, Andrew.Jimenez@usdoj.gov; and Jayson B. Ruff, jayson.b.ruff@usdoj.gov);
- Counsel to the Committee: Dykema Gossett PLLC, 5 Houston Center, 1401 McKinney Street, Suite 1625, Houston, TX 77010 (Attn: Basil A. Umari, BUmari@dykema.com; Nicholas Zugaro, nzugaro@dykema.com; and Alexandria Rahn, arahn@dykema.com); and
- Counsel to the DIP Lender: Akerman LLP. 2001 Roass Avenue, Suite 3600, Dallas, TX 75201 (Attn: David W. Parham, david.parham@akerman.com, R. Adam Swick, adam.swick@akerman.com and Laura M. Taveras, laura.taveras.com);

If no objection is timely served pursuant to the Interim Compensation Order, the Debtor shall be authorized and directed to pay B&H an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection. Pursuant to the Interim Compensation Order, any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

I. Itemization of Services Rendered and Expenses

a. The time records of B&H consisting of a daily breakdown of the time spent by each person on each day and narratives of the work performed are attached as **Exhibit A** to this Fee Statement.

b. The following chart identifies the individuals and their respective titles that provided services during the Statement Period. It includes information regarding their respective billing rates and the total number of hours spent providing services during the Statement Period for which B&H seeks compensation.

Name of Professional Person	Position of the Applicant	Hourly Billing Rate	Total Billed Hours	Total Compensation
Margaret I. Butler	Partner	\$910.00	13.60	\$12,376.00
Christopher J. Carolan	Partner	\$1,030.00	15.00	\$15,450.00
Adam W. Finerman	Partner	\$855.00	4.50	\$3,847.50
Elizabeth A. Green	Partner	\$845.00	51.50	\$43,517.50
Patrick M. Muldowney	Partner	\$615.00	1.10	\$676.50
Jimmy D. Parrish	Partner	\$715.00	31.00	\$22,165.00
Jorian L. Rose	Partner	\$950.00	60.4	\$57,380.00
Michael T. Delaney	Counsel	\$560.00	76.2	\$42,672.00
Elyssa S. Kates	Counsel	\$980.00	2.10	\$2,058.00
Christopher W. Lamb	Associate	\$380.00	27.40	\$10,412.00
Danielle L. Merola	Associate	\$530.00	128.70	\$68,211.00
Scott E. Prince	Associate	\$500.00	10.00	\$5,000.00
Lance S. Tupikin	Associate	\$655.00	7.80	\$5,109.00
Melissa A. Vander Weide	Paralegal	\$345.00	51.30	\$17,698.50
TOTAL			480.60	\$306,573.00

c. The following chart identifies the expenses by category.

Expense Category	Total Expenses
Automated Research	\$180.72
Delivery Services	\$13.94
Miscellaneous Fees	\$13.00

TOTAL	\$207.66
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II. Total Amount Payable

Accordingly, the amount of compensation and expenses payable for this Statement Period is \$245,466.06, which is calculated as follows:

Total Fees for Services Rendered During Statement Period	\$306,573.00
Twenty Percent (20%) Holdback	\$61,314.60
Fees Minus Holdback	\$245,258.40
Costs (100%)	\$207.66
TOTAL PAYABLE	\$245,466.06

WHEREFORE, B&H requests payment of: (i) compensation in the amount of \$ (80% of \$) on account of actual, reasonable and necessary professional services rendered to the Debtors by B&H and (ii) reimbursement of actual and necessary costs and expenses in the amount of \$207.66 incurred on behalf of the Debtors by B&H.

Dated: June 12, 2023

Respectfully submitted,

BAKER & HOSTETLER, LLP

/s/ Elizabeth A. Green

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 12, 2023, a true copy of the forgoing was filed with the Court using the CM/ECF System, which will provide notice of such filing to all parties requesting such notice and via electronic mail to the Fee Notice Parties as defined in the Interim Compensation Motion.

/s/ Elizabeth A. Green
Elizabeth A. Green